

1 STEWART TITLE & ESCROW, INC.
2 10505 JUDICIAL DRIVE, STE. 300
3 FAIRFAX, VIRGINIA 22030

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5 UNITED STATES BANKRUPTCY COURT
6 EASTERN DISTRICT OF VIRGINIA
7 RICHMOND DIVISION

8 IN RE: Amy Fay Robinson

Case No. 11-31815-KRH

9 Debtor(s)

AP Case No.: 13-03057-KRH

10 Plaintiffs,

11 v.
12 STIPULATION FOR NON-MONETARY
13 JUDGMENT AS TO DEFENDANT
14 STEWART TITLE & ESCROW, INC.

15 JP Morgan Chase Bank, N.A.
16 P.O. Box 182106
17 Columbus, OH 43218-2106

18 Stewart Title & Escrow, Inc.
19 10505 Judicial Dr., Ste. 300
20 Fairfax, VA 22303

21 Plaintiff AMY FAY ROBINSON (“Plaintiff”), and Defendant STEWART TITLE &
22 ESCROW, INC. (“ST&E”), through their respective counsels, enter into this stipulation.

23 **RECITALS**

24 1. Plaintiff filed her complaint on March 15, 2013 to determine the validity, extent, and
25 priority of liens, and further relief as the nature of the case may require in Virginia.
26 2. Defendant ST&E’s sole interest in the Property herein arises from its alleged capacity as
27 trustee of a particular deed of trust (the “Deed of Trust”) referenced in Paragraph No. 7 in
28 Plaintiff’s Complaint.

29 **STIPULATION**

30 1. Plaintiff acknowledges and stipulates that ST&E has been named as a defendant in this

1 litigation solely in their alleged capacity as trustees under the Deed of Trust referenced in
2 Paragraph No. 7 of Plaintiff's Complaint and that ST&E has not been named as a defendant due
3 to any acts or omissions on their part in the performance of their duties as trustee.

4 2. ST&E has not been involved in any way with the subject loan, the Deed of
5 Trust, or the Property encumbered thereby, except in their capacity as the trustee under the Deed
6 of Trust.

7 3. ST&E agrees to be bound by whatever order or judgment is issued by the Court relating
8 to the Deed of Trust, and shall not be subject to any monetary awards for damages, attorney's
9 fees or costs.

10 4. ST&E will not be required to participate further in this action, will not be required to
11 respond to any of the pleadings in this action, and will not be required to appear at any hearings
12 or the trial of this action, but will be required to respond to any discovery requests as a nonparty.

13 5. The filing of this Stipulation is not intended to and does not prejudice the rights of any
14 trustor, beneficiary, or assignee under the Deed of Trust, and shall not constitute a waiver of any
15 other person or entity's rights or obligations under the Deed of Trust.

16 6. This Stipulation shall inure to the benefit of the parties and their successors and/or
17 assigns.

18 IT IS SO STIPULATED.

19
20 DATED: MAY ___, 2013 AMY FAY ROBINSON

21
22 BY: /s/ ROGER C. HURWITZ

23
24 DATED: MAY ___, 2013 STEWART TITLE & ESCROW

25
26 BY: /s/ SEAN O'CALLAGHAN
27 LITIGATION COUNSEL

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